Stephen Cipot/R2/USEPA/US 06/02/2006 03:22 PM

To Anthony Cinque <anthony.Cinque@dep.state.nj.us>

cc cipot.stephen@epamail.epa.gov, George Blyskun <George.Blyskun@dep.state.nj.us>, John Prendergast <John.Prendergast@dep.state.nj.us>

bcc

Subject Re: L.E. Carpenter 1st Quarter Monitoring Report, Wharton

EPA has reviewed the May 2006 1st Quarter 2006 monitoring report submitted by RMT for the L.E. Carpenter Site in Wharton, NJ. This report includes the MW19/ 'Hot Spot' sampling and former Air Products drainage ditch surface water sampling, involving two surface water samples. The sampling event was conducted using an interim site-wide monitoring well network under revised MNA monitoring protocols submitted by RTM. It is noted that surface water elevations were not monitored during the synoptic monitoring well measurement round. EPA's comments are as follows.

Regarding the MW-19 Hot Spot Area: The report confirms the continued presence of constituents from residual soil contamination from the vicinity of where former USTs removed in 1991. As stated by both the EPA and NJDEP previously, MW-19 continues to show levels of BTEX far exceeding NJGWQS standards and is a continuous concern. The levels detected at MW-19-5 have at various times been above the levels detected at MW-19. It is EPA's opinion that the source area has been sufficiently delineated to merit removal or further expedited treatment consideration. In addition, the report re-affirms previous statements that MW-19-7 is not 'always' directly downgradient of the remaining source, and this is a concern for furture migration, with the residences across Ross street in close proximity. While the levels of methane detected at MW-19-7 support natural attenuation in this vicinity, there is no basis for an estimate of time for the contaminant mass to be fully attenuated, as RMT would like to assert. The report indicates that an additional monitoring well is to be installed prior to the 2nd Quarter sampling event, identified as MW-19-12. At this time, EPA reiterates its firm position that some sort of enhanced hot spot treatment technology should be considered and implemented in the short term in the MW-19 area, such as DPE technology.

Regarding the surface water sampling: surface water sampling of the drainage ditch separating the L. E. Carpenter site from an adjacent former Air Products facility revealed low levels of DEHP, a site related constituent [di(2-ethylhexyl)phthalate] and BTEX. It should be noted that these were the only two



constituents analyzed for. The DEHP results exceeded NJDEP criteria at both downgradient locations, with a slight increase between sampling locations SW-D-2 and SW-D-3. Although the results were "j" qualified, additional sampling location(s) further downstream are recommended at this time, with sampling proceeding at a clearly defined spacing until the extent has been adequately delineated. It should be noted that this drainage ditch flows into the Rockaway River.

The report indicates that the new post remediation monitoring well network was scheduled to be installed starting the week of May 15, 2006, however, it is EPA's understanding that this has not happened. When are the actual installation and sampling events scheduled?

Thank you for the opportunity to review the above report. Should you have any questions, please do not hesitate to contact me at your earliest convenience.

Stephen Cipot

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Anthony Cinque <Anthony.Cinque@dep.state.n j.us>

06/01/2006 12:14 PM AST

ToStephen Cipot/R2/USEPA/US@EPA

CcGeorge Blyskun <George.Blyskun@dep.state.nj.us>,
 John Prendergast
<John.Prendergast@dep.state.nj.us>

bcc

SubjectRe: L.E. Carpenter 1st Quarter Monitoring Report, Wharton NJ

Steve,

you can send the comments via email. The well on Ross St. and 5 or 6 others are going in starting on June 5 (Mon.) The others (in wetland area) will have to wait as LE needs to get a GP4-14 permit through LURP.

George,

in case you wanted to head out this is the timeframe as of today but I would check with Nick before you went.

Anthony

>>> <Cipot.Stephen@epamail.epa.gov> 05/31/06 2:49 PM >>>

Hello Anthony,

I will have EPA's comments ready to send you within a few days.

would you like them, via an email or a comment letter? By the way, the

report indicates that the new monitoring well network was scheduled to

be installed starting the week of May 15, 2006. Did it go in? What is

the status and when is the actual sampling event scheduled?

Should you have any questions, please do not hesitate to contact me at your earliest convenience.

Thank you,

Stephen Cipot

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